

UNITED STATES OF AMERICA  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Periodic Reporting of Service  
Performance

Docket No. RM2022-7

**COMMENTS OF THE ASSOCIATION FOR POSTAL COMMERCE**  
(October 31, 2022)

Pursuant to Order No. 6275, the Association for Postal Commerce (“PostCom”) submits these comments regarding the Commission’s proposed requirements for periodic reporting of service performance.

As noted in our comments in response to Order No. 6160, service quality is of the utmost importance to PostCom’s members, which collectively account for billions of dollars in postage spending annually. While commercial mailers often track every piece of mail they send, and therefore may know more about service quality than members of the general public, efforts by the Commission to enforce public reporting requirements are an important element in ensuring that postal customers receive the service level that they pay for.

PostCom appreciates the Commission’s effort to bring clarity and transparency to service performance reporting. The new requirements proposed by the Commission will foster improved transparency and greatly improve public understanding of the Postal Service’s performance.

The Commission has rightly recognized three areas for improvement which will improve service performance reporting:

- Greater granularity through isolation of specific uses of mail, *e.g.* election mail
- Increased focus on pieces of mail that have been excluded from measurement
- Inclusion of variance around average days to deliver

PostCom expects that these changes will produce improvements but suggests refinements that would offer further enhancements and close some apparent gaps in service performance reporting.

1. Additional Data

Because the Commission's efforts in this docket have naturally focused on products, there is an implicit reliance on measurement of individual pieces of mail. Indeed, one of the benefits of the intelligent mail barcode (IMB) is that it facilitates detailed analysis of this kind. On the other hand, the quantity of mail pieces being measured may, in some cases, obscure operational problems and impede understanding.

For instance, PostCom applauds the Commission's decision to isolate reply mail as a distinct category within First-Class Mail. In some cases, *e.g.*, some election mail, this should improve specificity in results reporting. In other cases, in particular remittances where the recipient uses caller service, operational protocols will result in significant quantities of mail being excluded from measurement. For large volume PO Box/Caller Box recipients, reply mail is often sorted to the destination ZIP code at origin, travels in direct trays to destination, and avoids the need for piece-level sorting at destination. Nested piece-to-tray scans are needed at destination in order to get stop-the-clock events that will enable these large volumes of remittance mail to be included in First-Class Single Piece service performance.

While PostCom acknowledges that collection of reason data will indirectly shine a light on this type of problem, a better solution would be to require the Postal Service to report on its container scanning performance. The Postal Service scans trays and other containers in numerous operations and would be able to provide data to the Commission with minimal effort

or cost. Although piece scan data would indirectly reveal scan performance, PostCom believes that reporting on container scanning would provide better diagnostic value.

In addition to container information, PostCom urges the Commission to collect and examine Postal Service data on last mile impacts. Mailer data reveals patterns in last mile failures that suggest non-random differences in service performance. Those differences may reflect local resource constraints or management directives. Whatever the cause, those differences affect customer satisfaction and service quality and should therefore be reported.

## 2. The Need for Parsimony

In its Order, the Commission addressed PostCom's recommendation that reporting on non-postal services ought to be minimized. While PostCom accepts the Commission's specific finding in this instance, PostCom remains concerned that the resources used to report on performance be linked to the value of the resulting reports.

In updating CFR part 3055, in each reporting category, the Commission has included the following requirement:

For each product that does not meet its service goal during the reporting period, report the point impact data for the top ten root causes of on-time service performance failures, at the Postal Administrative Area and National levels, during the previous fiscal year.

PostCom agrees in principle that root cause analysis can enable improvements. However, based on the experience of our members, we caution that requiring the top ten reasons may result in a burdensome requirement with limited practical value. Instead, PostCom recommends limiting this reporting to the top three root causes. In the event that the top three proves insufficient, the Commission could increase the number.

## 3. Summary and Conclusion

For reasons explained in PostCom's original comments, greater transparency is not sufficient to ensure improvement or accountability. The changes recommended by the

Commission are an important first step in improving reporting. PostCom must remind the Commission that improved reporting is beneficial to customers only if it results in improvements in performance. The Commission has determined the linkage between reporting and results is beyond the scope of the current proceeding.. That does not absolve the Commission of its duty to regulate the monopoly provider of postal services in the United States.

The number of issues explored in this Docket is evidence of how reporting must evolve over time. In other dockets, PostCom has opined on the need to limit the duration of ongoing proceedings, yet as the Postal Service continues to implement significant changes in its processing and delivery network, there is likely to be an ongoing need to refine service performance reporting. Rather than wait for legislation or to receive a formal request for rulemaking, the Commission should consider a prompt examination of the effectiveness of the instant Order no more than two years from the date of implementation.

The passivity of the Commission in this regard – one wonders if this docket would have been undertaken if not for Congressional demands – continues to weigh on mailers who have for decades paid, in ever larger amounts, for service that has not met ever-diminishing standards. It should not fall to the industry to initiate further proceedings to remedy these service problems. If the Commission maintains this docket is not the appropriate forum to address substantive service issues, it should identify a forum in which to do so.

Respectfully submitted,

*/s/ Matthew D. Field*

Matthew D. Field  
Ian D. Volner  
VENABLE LLP  
600 Massachusetts Ave., NW  
Washington, DC 20001  
(202) 344-8281  
[mfield@venable.com](mailto:mfield@venable.com)  
[idvolner@venable.com](mailto:idvolner@venable.com)  
*Counsel for Association for Postal Commerce*